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11 Attorneys for Defendant
12 Eli Lilly and Company, a corporation

13 **UNITED STATES DISTRICT COURT**
14 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

15
16 IN RE INCRETIN-BASED
17 THERAPIES PRODUCTS LIABILITY
LITIGATION

CASE NO. 13-MD-2452 AJB (MDD)

**MEMORANDUM IN SUPPORT OF
BILL OF COSTS SUBMITTED BY
DEFENDANT ELI LILLY AND
COMPANY**

Date: January 4, 2015
Time: 10:00 a.m.

Judge: Hon. Anthony J. Battaglia

Pursuant to Fed. R. Civ. P. 54(d) and Civ. LR 54.1, Eli Lilly and Company hereby submits this Memorandum in Support of Bill of Costs. Eli Lilly and Company claims \$62,338.05 in deposition costs incurred in connection with this action as summarized by the table below.

Date	Deponent	Transcript Cost (excl. video, packaging, delivery)	Deponent Category	Court Reporter
9/30/14	Brett, Jason	\$1,849.60	Defendant Employee	U.S. Legal
9/29/14	Brookfield, Jennifer	\$1,678.95	Defendant Employee	U.S. Legal
9/26/14	Bump, Richard	\$1,759.25	Defendant Employee	U.S. Legal
10/1/14	Chang, Curtis	\$942.50	Defendant Employee	U.S. Legal
9/24/14	Clay, Richard	\$3,035.90	Defendant Employee	U.S. Legal
10/16/14	Eader, Lou Ann	\$1,908.85	Defendant Employee	U.S. Legal
2/12/14	Edelberg, Helen	\$550.50	Defendant Employee	U.S. Legal
1/10/14	Engel, Samuel	\$564.80	Defendant Employee	U.S. Legal
10/8/14	Engel, Samuel	\$1,730.35	Defendant Employee	U.S. Legal
9/17/14	Ferguson, Jeffrey	\$948.25	Defendant Employee	U.S. Legal
2/12/14	Garman, Elin	\$1,374.50	Defendant Employee	U.S. Legal
10/2/14	Goldstein, Barry	\$1,393.85	Defendant Employee	U.S. Legal
11/21/13	Harris, Georgianna	\$904.20	Defendant Employee	U.S. Legal
2/26/14	Hostelley, Linda	\$1,564.85	Defendant Employee	U.S. Legal
10/2/14	Knudsen, Lotte	\$3,214.25	Defendant Employee	U.S. Legal
9/11/14	Maggs, David	\$1,705.65	Defendant Employee	U.S. Legal
10/10/14	Malone, James	\$1,063.05	Defendant Employee	U.S. Legal
10/13/14	Moses, Alan	\$2,349.00	Defendant Employee	U.S. Legal
10/14/14	Motsko, Stephen	\$2,345.25	Defendant Employee	U.S. Legal
10/8/14	Owen, Kathryn	\$781.40	Defendant Employee	U.S. Legal
3/25/14	Owen, Kathryn	\$1,357.30	Defendant Employee	U.S. Legal
5/23/14	Scott, Meri Kay	\$989.20	Defendant Employee	U.S. Legal

Date	Deponent	Transcript Cost (excl. video, packaging, delivery)	Deponent Category	Court Reporter
9/30/14	Thompson, Michelle	\$703.10	Defendant Employee	U.S. Legal
3/24/14	Thompson, Michelle	\$1,047.90	Defendant Employee	U.S. Legal
10/9/14	Yu, Jenny	\$1,150.75	Defendant Employee	U.S. Legal
5/8/14	Yu, Yin	\$2,312.20	Defendant Employee	U.S. Legal
10/27/15	Fuchs, Charles	\$1,265.90	Defendant's Expert	U.S. Legal
11/5/15	Gibbons, Robert	\$1,070.30	Defendant's Expert	U.S. Legal
5/28/15	Goldkind, Lawrence	\$1,231.25	Defendant's Expert	Zanaras
11/9/15	Betensky, Rebecca	\$1,367.05	Plaintiff's Expert	Golkow
8/20/15	Brown, Thomas	\$962.55	Plaintiff's Expert	Golkow
8/27/15	Buteau, Jean	\$1,219.91	Plaintiff's Expert	Golkow
8/12/15	Chandrasoma, Parakrama	\$1,260.53	Plaintiff's Expert	Golkow
5/22/15	Fleming, G. Alexander	\$1,017.85	Plaintiff's Expert	Golkow
10/12/15	Gale, Robert	\$1,905.75	Plaintiff's Expert	Golkow
9/1/15	Greenland, Sander	\$1,182.24	Plaintiff's Expert	Golkow
9/2/15	Kipen, Howard	\$772.59	Plaintiff's Expert	Golkow
8/21/15	Landolph, Joseph	\$1,633.12	Plaintiff's Expert	Golkow
10/19/15	Madigan, David	\$1,310.79	Plaintiff's Expert	Golkow
9/17/15	Sedo, Aleksi	\$529.05	Plaintiff's Expert	Golkow
10/15/15	Taylor, Clive	\$1,268.58	Plaintiff's Expert	Golkow
9/18/15	Woolf, Graham	\$2,120.64	Plaintiff's Expert	Golkow
9/23/14	Buse, John	\$1,150.05	Third Party Witness	U.S. Legal
3/31/14	Skyler, Jay	\$1,844.50	Third Party Witness	U.S. Legal
	TOTAL	\$62,338.05		

Invoices supporting each of these costs are attached to the Declaration of Matthew J. Hamilton as Exhibit 2. Such costs are allowable under Fed. R. Civ. P. 54(d) and Civ. LR 54.1, are correctly stated, and were necessarily incurred.

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Dated: December 14, 2015

Respectfully submitted,
PEPPER HAMILTON LLP
NINA M. GUSSACK
KENNETH J. KING
MATTHEW J. HAMILTON

LATHAM & WATKINS LLP
ROBERT M. HOWARD

By: /s/ Matthew J. Hamilton

Attorneys for Defendant
Eli Lilly and Company, a corporation